



Implementation Plan

**REGIONAL STRATEGY
FOR THE ENVIRONMENTALLY SOUND MANAGEMENT OF USED
LEAD ACID BATTERIES
IN CENTRAL AMERICA, COLOMBIA, VENEZUELA
AND THE CARIBBEAN ISLAND STATES**

**First Draft
(28 May 2008)**

INDEX

Section	Subject	Page
1	<u>Introduction</u>	2
2	<u>Objectives of the Project</u>	6
3	<u>Current Situation in the Pilot Countries</u>	7
4	<u>New Factors to Consider when Implementing the Regional Strategy</u>	9
5	<u>Benefits of a Regional Approach to the ESM of ULAB</u>	12
6	<u>Implementation Project – Outline Plan</u>	13
7	<u>Project Implementation Considerations</u>	14
8	<u>Project Implementation Process</u>	15
9	<u>List of Smelters that have been assessed for ESM</u>	22
10	<u>Budget</u>	23
	Total Budget for the Implementation of the Regional Strategy	24
	Infrastructure and Capacity building Budget	25
	Policy Development, Training and Awareness Budget	26
	SUMMARY of 4 year Budget	27
11	<u>Project Time Line</u>	29

1. INTRODUCTION

Used lead acid batteries (ULAB) are an important and valuable resource of secondary lead. If managed improperly, the constituents of the batteries, such as the lead, lead oxides and sulfuric acid, may pose a threat to human health and the environment.

ULAB are classified as a hazardous waste under the *Basel Convention for the Control of Transboundary Movements of Hazardous Wastes and their Disposal* (Basel Convention)¹. To provide guidance on the environmentally sound management (ESM) of ULAB, Parties to the Convention adopted the *Basel Technical Guidelines for the Environmentally Sound Management of Lead Acid Battery Wastes* and developed the *Basel Training Manual on National Management Plans for Used Lead Acid Batteries*.

There are good examples of compliance with the Basel Technical Guidelines and the regulations on the transboundary movement of ULAB in Central America, Colombia, Venezuela and the Caribbean Islands, but implementation of environmentally sound recovery practices for ULAB and enforcement of the existing requirements for ESM of ULAB throughout the whole region is still a matter of concern.

The *Ministerial Declaration on Environmentally Sound Management of Hazardous Wastes* was adopted by the 5th Conference of the Parties to the Basel Convention in December 1999. The Ministerial Declaration called for enhanced partnerships between the public and private sector to improve the manner in which hazardous wastes and recyclables are managed in developing countries, thereby minimizing the potential risks to human health and the environment posed by these substances.

To begin implementing the Ministerial Declaration, a first list of technical assistance projects was approved for funding at the 16th session of the Technical Group of the Basel Convention, held in Geneva, Switzerland, during April 2000. This list included the "Sub-regional project for building capacity on the Environmentally Sound Management of Used Lead Acid Batteries in Central America and the Caribbean." Nine Party² countries to the Basel Convention in the region were selected to pilot this project, namely Colombia, Costa Rica, Dominican Republic, El Salvador, Mexico³, Panama, St. Lucia, Trinidad and Tobago, and Venezuela.

The project represented Phase I of the regional initiative, which focused on gathering information and identifying any problems linked to the generation, collection, storage, transport, illicit reconditioning or recovery operations, recycling and disposal of ULAB (or its residues) in the pilot countries. A Project launching workshop was held in Trinidad during 3 - 4 May 2001 to initiate the pilot program.

¹ ULAB are identified as hazardous wastes under Annex I (Y31-lead & lead components, Y34-acidic solutions or acids in solid form) and Annex VIII (A1160-waste lead acid batteries, whole or crushed).

² The term Party refers to a country government that has agreed to adopt the Basel Convention by means of accession, acceptance, approval, formal confirmation, ratification or succession.

³ Mexico does not receive project funding for this regional initiative due to its unique economic status amongst the pilot countries (i.e. it is a member of the Organization for Economic Cooperation and Development).

Representatives from governments and national cleaner production centres from the pilot countries, and the Basel Convention Regional Centres for Central America and Mexico (BCRC-CAM) and the Caribbean (BCRC-CARIBBEAN, then operated by the Caribbean Research Institute CARIRI) participated at the workshop. The workshop was also supported by the Secretariat of the Basel Convention (SBC), the Capacity-building Task Force (CBTF) on Trade, Environment and Development of the United Nations Conference on Trade and Development (UNCTAD), the International Lead Management Centre (ILMC) and the United States Environmental Protection Agency (US EPA). Workshop outcomes included adopting a project work program, assigning organizational roles and responsibilities, and approving guidelines and questionnaires for completing national ULAB inventories.

A follow-up workshop was held in San Salvador, El Salvador during 18 - 20 November 2002 to share key observations from the nine pilot countries with other interested countries and relevant stakeholders in the region. The *Declaration of San Salvador on the Environmentally Sound Management of Used Lead Acid Batteries* called for national improvements concerning the management of ULAB, was also signed at this occasion.

Based on this mandate, a strategic planning framework and project proposal was prepared to undertake Phase II of the regional initiative and the development of a *Regional Strategy for the Environmentally Sound Management of Used Lead Acid Batteries in Central America, Colombia, Venezuela and the Caribbean Island States*. The proposal package was initially shared with delegates at COP6 and subsequently approved for financing at the First Session of the Opening Working Group (OWG1) of the Basel Convention held during 28 April - 2 May 2003.

A Regional Steering Committee consisting of the nine pilot countries, Jamaica, Barbados and the ILMC was tasked to coordinate Phase II project activities. The Committee held its first meeting during 4 - 5 December 2003 in Caracas, Venezuela. Other stakeholders, including representatives from country governments, private companies, universities, research institutes, and non-government organizations in the region were also invited to participate. Two key recommendations were made at the meeting:

- to consider the inclusion of countries in the region that are not Parties to the Basel Convention⁴ in the Regional Strategy; and
- for participating countries to establish National Committees to coordinate national efforts on ULAB in accordance with a country project model for the determination of a National Strategy for the ESM of ULAB.

The representatives also agreed to adopt a seven step process as a country project model to establish the ESM of ULAB. Each participating country agreed to follow this model in the preparation of its national action plan (NAP).

⁴ The following countries are located in the Region but are not Parties to the Basel Convention: Haiti, Grenada, and the USA.

The first stage of the model was to complete an inventory of the likely sources of ULAB, with particular attention to the quantities, collection mechanisms, collection rates and possible trends in ULAB for the next five years. The inventory also included a list of licensed (or certified) secondary lead plants where appropriate, complete with a summary of smelting capacity, environmental control systems and occupational welfare provisions. If possible, unlicensed reconditioners, illegal smelters and legitimate battery retailers were also recorded together with summaries of their operations, noting any environmental threats.

The model requires that measures must be introduced to raise the level of public awareness and the threats posed by the improper recovery of ULAB. In this respect the University of the West Indies provided samples of information leaflets and pamphlets prepared for communities in the Caribbean that had either been exposed to lead wastes or were likely to come into contact with ULAB.

National policies, legislation and enforcement procedures should be designed to promote ESM and eliminate any ULAB recycling in the “informal” sector, directing those involved in “informal” and environmentally damaging activities towards ULAB collection and transport to approved environmentally sound ULAB recycling plants.

The Basel Technical Guidelines formed the basis for implementing procedures for collection, storage, transport and shipping of ULAB. To provide a means of uniformly determining compliance with the requirements of the Technical Guidelines, an Assessment Procedure was developed in conjunction with the Green Lead Project Work Group. This Assessment Process for the determination of ESM and compliance with the Basel Technical Guidelines should be applied to all ULAB recycling plants, collection centers and transport operations.

For those countries without smelting capacity the model for the establishment of ESM for ULAB ends at step number 6, and for those countries provision was outlined or suggested to export ULAB to a certified smelter for recycling. Those countries with lead smelters proceeded to the final stage and to the necessary measures to ensure that the recycling process was in compliance with the Basel Technical Guidelines and properly certified and licensed by the appropriate government authorities.

The information gathered, collated and analysed in the preparation of NAP was subsequently used to devise a logical framework for use in preparing the Regional Strategy for the ESM of ULAB.

The BCRC-CAM and the BCRC-CARIBBEAN, in cooperation with the Venezuelan Ministry of Environment and Natural Resources (MARN-Venezuela), prepared a first draft of the Regional Strategy that was published in December 2004 and presented for further discussion at the second meeting of the Regional Steering Committee held during 24-26 January 2006, in El Salvador. The Regional Strategy was subsequently revised to take into account country and other stakeholder input and then finally reviewed at a regional delegate meeting in Trinidad in October 2006.

The Region, as defined by Central America, Columbia, Venezuela and the Caribbean Islands, consists of both Party and non-Party countries to the Basel Convention. The Party status and geographic locations of all countries in the region that could theoretically participate in the implementation of the Regional Strategy are identified as follows:

Antigua and Barbuda	France	Panama
Bahamas	Grenada	Saint Kitts and Nevis
Barbados	Guatemala	Saint Lucia
Belize	Guyana	Saint Vincent and the Grenadines
Colombia	Haiti	Suriname
Costa Rica	Honduras	Trinidad and Tobago
Cuba	Jamaica	United Kingdom of Great Britain and Northern Ireland
Dominica	Mexico	United States of America
Dominican Republic	Netherlands	Venezuela
El Salvador	Nicaragua	European Economic Commission (European Union)

Implementation of the Regional Strategy will initially focus on the nine countries in the region that were selected to pilot this project, and eventually broaden in scope to include other interested countries pending their formal confirmation to participate. The inclusion of non-Party countries in the region would also benefit the delivery of the Regional Strategy; however, a final decision regarding this matter has yet to be made.

The nine countries that participated in the first phases of this project are:

Colombia	El Salvador	Saint Lucia
Costa Rica	México	Trinidad and Tobago
Dominican Republic	Panama	Venezuela

2. OBJECTIVES OF THE IMPLEMENTATION PROJECT

- i. Implementation of the Country National Action Plans (NAP) for the Countries that participated in Phase 1 of the Project for the ESM of ULAB, namely, Colombia,
- ii. Where synergies have changed since the completion of Phase 1, such as in El Salvador with the closure of the Grupo Record ULAB recycling plant, NAP to be revised. Such revisions will be necessary for Costa Rica, Dominican Republic, El Salvador and Panama and other countries will need to ensure that all NAP are current.
- iii. In order to maximize the use of ULAB recycling capacity in the region and reduce the dependency on the Informal sector, Guatemala to be invited to join the Project as a full participant. MARN in Guatemala will be required to prepare a National inventory of ULAB and also a NAP, and that will also require implementation.
- iv. The harmonization of National Laws and Regulations applicable to the collection, storage, transport and recycling of ULAB so that there is a common approach to the regulation of ULAB recovery. Furthermore, National Legislation, whilst exerting controls on any domestic recovery operations for ULAB, should also facilitate the transport of ULAB across national boundaries where the ULAB are being moved in accordance with the Basel Convention to be recycling in an environmentally sound manner at an approved (Certified – see below) recycling plant.
- v. The harmonization of forms and documentation across the region by the relevant MARN's and Customs Offices for the administration of the Basel Convention for the transboundary movement of ULAB.
- vi. The Assessment of all Secondary Lead Recycling Plants that are recycling ULAB in the Region and especially those recycling plants in the countries participating in the Implementation Project, together with all major ULAB collection centers and storage compounds – including those located in battery retailers to determine environmental performance and compliance with national legislation, international conventions and the Basel Technical Guidelines.
- vii. The development of an ESM Certification Scheme to provide a list of approved ULAB Collection Centers, Storage Depots, Transport Companies and Recycling Plants to provide Governments in the Region with an assurance that ULAB sent to, handled or recycled by any company on the list would also be in a manner in compliance with national legislation, international conventions and the Basel Technical Guidelines. The Certification scheme will be developed in partnership with the Green Lead Work Group to ensure consistency with global best practice
- viii. Full implementation of the Regional Strategy of 2006 for the ESM of ULAB

3. CURRENT SITUATION IN THE PILOT COUNTRIES

Phase I of the regional initiative involved the compilation of a ULAB inventory and an assessment of the level of ESM of ULAB in each of the nine Party countries to the Basel Convention. Other Parties in the region also participated throughout various stages of the regional ULAB initiative.

The current situation for each of the Pilot Countries is as follow:

	ULAB Inventory	NAP	NAP Implemented
Colombia	✓	✓	✓
Costa Rica	✓	✓**	✗
Dominican Republic	✓	✓**	✗
El Salvador	✓	✓*	✗
Guatemala	✗	✗	✗
México	✓	✓	✓
Panama	✓	✓**	✗
Saint Lucia	✓	✓	✗
Trinidad and Tobago	✓	✓	✓
Venezuela	✓	✓	✓

*

El Salvador – Currently revising the Inventory and NAP.

**

– the NAP may require revision.

All the Phase 1 participating Pilot Program countries have completed their respective ULAB Inventories and prepared and submitted National Action Plans (NAP) for the ESM of ULAB. Guatemala was not a participant in the first phase and has yet to complete a ULAB inventory and prepare a NAP.

Following the closure of the Grupo record plant in El Salvador, NAP for Costa Rica, Dominican Republic, El Salvador and Panama are either being revised or reviewed.

The inventories from the participants in the Pilot Program showed that the Countries fell into two distinct categories, that is:

- Countries or island states with smelting capacity
- and
- Countries or Island States without smelting capacity
 -

The Countries with Smelting Capacity were Colombia, El Salvador, the Dominican Republic, Mexico, Panama and Venezuela. Guatemala also has smelting capacity.

Country Reports compiled during the first phase of the Project can be accessed from the Basel Convention Web Site at: www.basel.int

4. New Factors to Consider when Implementing the Regional Strategy

The agreed Regional Strategy for the ESM of ULAB remains unchanged irrespective of the dynamics of the countries in the Region, because the Strategy is designed to be independent of changes in ULAB consumption, smelter operations and legislation. The Regional Strategy provides a robust focus on the approach and the means of securing the ESM of ULAB.

However, NAP will be affected by changes in ULAB consumption, smelter operations and legislation and consequently so will the Project's dynamics. When the Regional Strategy was agreed in Trinidad in 2006 the synergies were such in Central America that the implementation of the Strategy appeared to be a straightforward matter with El Salvador at the center of the ULAB collection and recycling infrastructure in Central America. However, the recent closure of the Grupo Record recycling plant in El Salvador has changed the circumstances completely.

Since then, the Enertec (Mexico) Company have been working with the Government of El Salvador to upgrade ULAB collection facilities and set up the necessary procedures to export the ULAB from El Salvador to Mexico in compliance with the Basel Convention for the Transboundary movement of hazardous waste. The collaboration between Mexico and El Salvador must be praised, particularly in improving the conditions of ULAB collection and storage in El Salvador, and transport to Mexico and the recycling in Monterrey in compliance with all national legislation, international conventions and the Basel Technical Guidelines. However, it will take some time and considerable investment to raise the standards of the collection and storage facilities in El Salvador to comply with safety legislation and the Technical Guidelines.

Should Mexico choose to secure ULAB from the other countries in Central America, such as Costa Rica and Panama, then the same circumstances will apply as with El Salvador. NAP will have to be amended and a formal collection and storage infrastructure established. The problem here is not that it will take more time for all the countries to reach full compliance with the Technical Guidelines, but whether Mexico has the capacity to recycle all the ULAB generated in Central America as well as recycle all the domestic batteries and ULAB imported from the USA. A reappraisal of the smelting capacity amongst the Mexican smelters is required and some consideration given to the distances that ULAB will have to be transported by truck from Panama and Costa Rica to the North of Mexico.

Account also has to be taken of the changing situation in Panama where the Government recently licensed the PAMESTA smelter to commence a limited operation to refine imported lead bullion for the production of battery alloys. The management at the PAMESTA plant would like to recommence ULAB recycling, but for such operations to recommence the plant would have to undergo a major upgrade to ensure environmentally sound management.

The plan for implementing the regional strategy is to start activities in the countries that had participated in the Pilot Program – and then – roll out the strategy to other countries in the region. However, in the light of the need for such countries as El Salvador, Costa Rica and Panama to revise their NAP, such revisions should be fully incorporated into the proposed program for implementation of the regional strategy.

When the Project commenced in Trinidad in 2001, the Acumuladores Iberia SA recycling plant in Guatemala City was an “informal” recycling plant operation. In the intervening years, however, the plant has been upgraded considerably to the point where operations now comply with all Guatemalan legislation for environmental controls and safety, and the plant is about 2 months away (June/July 2008) from meeting the requirements for ESM set out in the Basel Technical Guidelines.

Furthermore, improved efficiency at the plant means that it is only operating at between 55 and 57% of capacity and a maximum of 22 days a month. There is a case for considering whether the Acumuladores Iberia SA recycling plant in Guatemala City could recycle ULAB (or some ULAB) from countries in Central America. If this were the case then in many instances the carbon footprint created by trucking ULAB to the North of Mexico would be avoided.

However, Guatemalan law, like most in Central and South America, prohibits the import of Hazardous Waste and thereby excludes the import of ULAB into Guatemala. Since the demise of the Grupo Record operation in El Salvador, the management at the Acumuladores Iberia SA recycling plant have made representation to the Government for a special dispensation to allow the company to source and import ULAB from outside Guatemala.

If the Regional Strategy is to be effective, all resources and synergies in the Region need to be exploited to cope with the number of ULAB that become available for recycling as more informal operations are either closed or cease operations as border controls are improved. There is therefore a good case for inviting the Guatemalan MARN to join the Implementation Program at an early stage.

Other developments to bear in mind are that Cuba has commissioned a new Italian built Engitec ULAB Recycling Plant in Havana with a capacity of 20,000 tons per annum. This state of the art plant is designed to meet the most demanding of environmental standards, but it has a small capacity by recent standards, suggesting that it has really been designed to just recycle domestically generated ULAB. At the present time, whilst efforts should be made to visit the plant within the context of studying all potential Regional resources for the recycling of ULAB, the limited capacity of the plant suggests that there is little or no scope for it to make a contribution to the Regional Strategy by recycling ULAB generated in certain Caribbean Island States, such as Jamaica or the Dominican Republic.

Exports of ULAB from the Dominican Republic to El Salvador during the Pilot Program have been consistently shipped without the battery electrolyte and there is no clear indication where the battery acid is being disposed of in the country. Such instances suggest that the NAP for the Dominican Republic is still being implemented, but following the closure of the Grupo Record plant, there is once again uncertainty about the fate of ULAB in the Dominican Republic.

The decision by the Metaloxa Company to commission a new recycling plant designed to comply with all national legislation and meet the criteria set out by the Basel Convention will not change the requirements to implement their NAP or their situation in the short term. Indeed, assuming that the company obtain all the planning permissions required for lead smelter, the plant is probably two years away from completion. Until that time, the Dominican Republic will remain an exporter of ULAB.

The Steering Group that met in Trinidad in 2006 believed that it would take approximately two years to implement the Strategy. However, the closure of the Grupo Record recycling plant in El Salvador and the need to revise NAP in most of the countries in Central America will probably add another two years to the implementation timetable. Furthermore, the dismantling of the Grupo Record ULAB collection network throughout Central America means that approximately 20 new ULAB collection and storage compounds will have to be built or existing premises modified to comply with the Basel Technical Guidelines.

5. Benefits of a Regional Approach to the ESM of ULAB

Many countries in the region are Party to the Basel Convention and the *Cartagena Convention for the Protection and Development of the Marine Environment in the Wider Caribbean* (Cartagena Convention)⁵ that includes the *Protocol on Marine Pollution from Land-Based Sources and Activities*. Implementing a regional solution that supports the ESM of ULAB demonstrates an ongoing commitment of the Parties to these international agreements. On the other hand, long-term failure to address specific ULAB problems and needs on a regional basis could potentially raise international concerns regarding the scope and magnitude of lead and battery electrolyte contamination in the region, and could adversely impact the tourism and fishing industries of SIDS in the region and other Caribbean States.

Formalizing national ULAB recovery and recycling programs throughout the region is also anticipated to generate trade benefits for ULAB exporting countries, particularly when the international spot market price for lead is high. This is due to the fact that recycled ULAB is the dominant source of lead globally, particularly in light of its declining use for dispersive sources such as pigments, gasoline additives, fishing weights, ammunition, cathode ray tubes, and solder⁶. In fact, secondary lead production has already overtaken primary lead production, accounting for over 60% of the total global lead supply. It is estimated that more than 60% of all secondary lead is derived from ULAB⁷.

Establishing an integrated collection infrastructure for ULAB will maximise the recycling resources in the Region for the ESM of ULAB and reduce considerably the opportunities for the informal sector to operate because most of the ULAB should be retained in the formal sector. A reduction in informal sector recycling activities will have considerable environmental benefits because battery acid will no longer be dumped in the rivers and sanitation system and the leaded emissions will no longer pollute nearby communities and local populations.

Contrary to popular belief, it is anticipated that there will be no loss of jobs in the informal sector. Instead those people working in the informal sector will be encouraged to continue to collect ULAB, but instead of recycling them, sell them to licensed recyclers. In this way, the informal workers improve their working conditions and with it their health prospects.

⁵ The Cartagena Convention in part requires Parties to prevent, reduce and control pollution of the Convention area and to ensure sound environmental management, using for this purpose the best practicable means at their disposal and in accordance with their capabilities.

⁶ In addition to being relatively easy to smelt and re-refine, lead can be recycled indefinitely and still match the quality (and price) of primary lead. The quality of secondary lead output depends on the refinery process employed.

⁷ The remainder is generally composed from wheel balance weights, pipe, solder, drosses, and lead sheets.

6. Implementation Project - Outline Plan

- i. Submit implementation plan with costs for support and funding to donors.
- ii. Decide the order in which countries should be involved in the implementation of the Regional Strategy.
- iii. Convene high level meeting of representatives from the participating Government Ministries of the Environment and Natural Resources and the Health Ministries to obtain renewed political support for the implementation of the Regional Strategy, and the elimination of unsound “informal” ULAB recovery operations.
- iv. Appoint a Coordination team administered by the two BCRC’s to oversee the implementation process and maximise the use of regional resources and appoint project staff (Project coordinator, Technical Experts and Trainers, etc);
- v. Distribute and explain the implementation process – through a regional Workshop with Industry and Government representation to optimise the regional resources and synergies – set up Steering Group and annual meeting schedule.
- vi. Participating countries to complete or revise NAP where appropriate, including implementation costs. Guatemala to complete inventory and NAP.
- vii. Implement any outstanding NAP, including installing necessary collection, storage and transport infrastructure, and undertake personnel training for Basel Convention and Technical Guideline compliance.
- viii. Train nominees from the participating countries to conduct Assessments for ESM, so that inspections can commence on a grand scale of all collection, storage, transport and recycling facilities.
- ix. Commence ESM Assessments of Recycling Plants and ULAB collection centers.
- x. Set up a Regional data base of approved environmentally sound ULAB collection, storage, transport and recycling plants to ensure that at every stage of the ULAB only facilities with ESM are used in the recovery process.
- xi. Train Customs staff in the correct procedures for the control of transboundary movements of ULAB.
- xii. Set up the necessary documentation procedures, where necessary, to record and facilitate the transboundary movements of ULAB in compliance with national and internal law in this matter.
- xiii. Launch education and policing program for the informal sector throughout the region to encourage the sound collection of ULAB to sell to certified smelters.
- xiv. Prepare and present an Annual Report to BCRCs and the SBC on progress
- xv. Regional Project Conference to roll the strategy out to all countries in the Region

7. Project Implementation Considerations

The concept of a regional strategy implies that participating countries will work in partnership to coordinate the design and delivery of actions that support each of the strategy's underlying goals, taking into account both national and regional perspectives. In fact, the reality is that unless the countries in the region cooperate fully with each other to facilitate the use of recycling resources, the Regional Strategy will fail and the void left in the formalised recovery process will be taken over by the informal sector with all the environmental and health problems generated by their illicit activities.

Although the Regional Strategy permits countries the flexibility to adopt their own policies and approaches to assure that ULAB are managed in an environmentally sound manner, it is equally important to ensure that national variations, where they may exist, interface well within the context of a regional solution.

Environmentally Sound Management (ESM) is defined under the Basel Convention (Article 2, paragraph 8) as:

“..... taking all practicable steps to ensure that hazardous wastes or other wastes are managed in a manner which will protect human health and the environment against the adverse effects which may result from such wastes.”

Criteria specific to ESM for ULAB is specified in the Basel Technical *Guidelines for the Environmentally Sound Management of Lead Acid Battery Wastes*. For the purpose of this Regional Strategy, the term “ESM-compliant” implies conformity with applicable requirements of the Basel Convention, Basel Technical Guidelines, national laws, and other regional criteria that may exist to assure that ULAB facilities and operations subscribe to ESM.

Recent events in the Region have highlighted the fact that, in some cases, in fact quite often with lead plants, government Ministries share administrative and enforcement duties under national laws; that is, the jurisdiction for health, safety and environmental controls. This can, and has posed challenges in the effective and consistent enforcement of laws (including inspection, monitoring and sanctions), particularly if roles and responsibilities of authorities overlap with differing agendas and objectives. In this respect it is vital that the different government Ministries communicate with each other so that all stakeholders are working towards the same goals in a coordinated manner that strengthens the efforts of all parties.

Lastly, incentives are also clearly needed in both informal and formal sectors to help drive facility and process improvements. In particular, this means paying a “fair price” to informal ULAB collectors when they deliver ULAB to the formal sector. It must be borne in mind by all stakeholders that the main reason the “informals” try to recycle ULAB is because they believe that they can make more money recycling the battery themselves. Great emphasis is placed on “policing” the Informal activities, but informal activities can be stopped immediately if a “Fair Price” is paid for ULAB and the informal will then deliver whole ULAB to the recyclers.

8. Project Implementation Processes

- ii. The first consideration should be given to the countries invited to participate in the Implementation of the Regional Strategy for the ESM of ULAB and to invite Guatemala as a full participant as soon as practicable.

The question for the SBC and the respective BCRC's to consider therefore is the order that the implementation process is implemented.

As the sharing of resources, especially environmentally sound recycling capacity is a key element in the ESM of ULAB, it would appear to be a waste of valuable recycling capacity if the ULAB Recycling Plant in Guatemala was unavailable to recycle ULAB generated and collected in Central America. More so now that the Grupo Record Plant in San Salvador has closed and 30,000 tons of recycling capacity has been lost.

It is recommended therefore that Guatemala is invited to participate. At the present time, MARN in Guatemala will not permit the import of ULAB – but the matter is currently under review. It could be that participation in the Implementation Project will persuade them that the overall benefits to health, the environment and job creation outweigh any reservations about the threats posed by importing ULAB.

Assuming that Guatemala is invited to participate in the Implementation Project the list of countries would be:

- Colombia
- Costa Rica
- Dominican Republic
- El Salvador
- Guatemala
- Mexico
- Panama
- St. Lucia
- Trinidad and Tobago
- Venezuela



- iii. Once the final list of participating Countries is confirmed the respective focal points and contact groups, including the Lead Industry should be sent a copy of the Regional Strategy and the Implementation Project for consideration and feedback.
- iv. One of the anomalies in the contacts between Government Agencies, the SBC and the respective BCRC's is the fact that in some countries the contact and working processes are with the Environment Ministries and yet in others it is with the Health Ministries. For the most part, communications and working arrangements with one or other of the agencies makes no difference to the outcomes of the project or the policy decisions.

As a precaution and to make sure that there is no misunderstandings about the objectives and delivery of the ULAB ESM project it is strongly recommended that a high level meeting is convened by the SBC to explain the reasons for the Regional Strategy and the benefits of working together to ensure that the Project is a success. Given Political commitment at the highest level respective ministries with different agendas should be able to reconcile the objectives of the Project within there overall remit without undue disruption to the Program. It is suggested that such a high level Government meeting should be convened as early in the life of the Project as possible.

- v. Whilst the implementation of the Regional Strategy for the ESM of ULAB will be the responsibility of the Governments that committed to the Project, the BCRC's in Trinidad and Tobago, and El Salvador will be expected to take a lead role in the Project.

However, the BCRC's have many responsibilities and it is recommended that the BCRC's appoint a single Project Coordinator to manage the implementation program, together with an industry expert to provided technical support and any other support staff, full or part time, such as a trainer.

The Project Coordinator would be under contact for a four year period and report to the BCRC representatives in Trinidad and Tobago, and El Salvador. As there are two distinct languages in the Region, the Project Coordinator must be fluent in English and French and be conversant with the legal framework associated with the Basel Convention and management of hazardous waste.

Whilst is would be a distinct advantage to have a background in the battery manufacturing or lead smelting industry, as Technical Support will be available from either a separate appointment or the ILMC, it is not essential, but a technical or legal background would be beneficial to the project.

Technical support for the implementation process should be forthcoming from the ILMC, but if the Steering Committee believes that additional expertise is required then it is recommended that a second person is appointed for a four year period.

In the first year of the project there will be a considerable training and capacity building program. The first phases of the ULAB project highlighted the need for better administration of the Basel Convention for the control of the transboundary movement of hazardous waste, particularly ULAB.

It was agreed by all the Government Delegates that a comprehensive training program for all those involved in the administration and control of hazardous waste should resolve all the deficiencies identified in the Region. It is anticipated that the SBC will provide the necessary instructors for the courses which will be held separately for English and Spanish speaking delegates.

A key element of the Strategy for the ESM of ULAB was the determination of Environmental Performance of UALB Recycling Plants, Collection Centers and Storage Compounds as measured against the requirements to comply with any relevant national legislation, international conventions or protocols and the Basel Technical Guidelines for the ESM of ULAB. The Assessment Tool to be used for the determination of environmental credibility was developed jointly between the SBC and the Green Lead Work Group and covers all aspects required for ESM of ULAB.

Use of the Assessment Form does, however, require some and guidance in the early stages and consequently Assessors need to be trained, tested, appointed and monitored. In this respect a separate Trainer should be appointed for one year to undertake these tasks, albeit this will not be a full time post. It is essential that the person appointed is familiar with the use of the Green Lead Assessment process, the Basel Technical Guidelines and speaks fluent English and Spanish.

In addition a clear understanding of the ESM Assessment Scheme will be beneficial to the development and introduction of the Certification Scheme for ESM.

- vi. During discussions in Trinidad when then Regional Strategy was being finalized most of the delegates thought that there were two distinct ULAB waste streams, namely those Countries in Central America and the Caribbean Island States.

It was clear that the majority of participants amongst the Caribbean Island States were recycling ULAB in Venezuela and shipping them via ACL in Trinidad. As this ULAB recovery route was already established when the Project commenced in 2001. It is tried and tested, and is now in full compliance with the Basel Convention and Technical Guidelines. Consequently, the delegates were thinking that it would logical to extend the recovery route to Venezuela to other Caribbean Island States, notably and in the context of the implementation stage, the Dominican Republic, and more so because of the closure of Grupo Record in El Salvador, where ULAB had been shipped up to September 2007.

The second distinct ULAB recycling zone was Central America and it was assumed by the delegates at the meeting in Trinidad in 2006, that ULAB in the Central American region would continue to be recycling in El Salvador. The closure of the Grupo Record plant in 2007 has changed that scenario.

The suggestion and recommendation to the Steering Committee is to invite Guatemala to join the Project in the belief that the Government and the Industry will see the benefits of participating and contributing towards the implementation of the regional strategy and go some way to filling the hole left in the region by Grupo Record.

However, the final decision on all these options must be with the respective governments and their representatives on the Steering Committee. It is therefore, essential to convene a Steering Committee meeting as soon as practical after the high level meeting and preferably following the appointment of the Project Coordinator.

The meeting would be tasked to determine the most effective approach to the use of available resources and set out the direction for the Project Coordinator.

- vii. The closure of the Grupo Record ULAB recycling plant in El Salvador and the cessation of ULAB collection by Grupo Record throughout Central America has left some countries with redundant NAP. It is likely that the NAP for El Salvador – the most affected – Costa Rica and Panama will have to be revised to take into account the new situation.
- viii. As far as the Private Sector is concerned, and in particular the battery retailers, garages and repair shops areas will have to be designated for the collection and storage of ULAB because the daily and twice weekly collections made by Grupo Record have ceased and collections by smelters in Mexico or Guatemala – if Guatemala joins the Project – will be only once a week at the most, more likely once a month. So ULAB storage areas will have to be expanded and constructed in accordance with Health, Safety and Environmental Legislation and be in compliance with the Basel Technical Guidelines. This undertaking represents a huge expense for the Industry and throughout the region is estimated to be approximately US\$ 2.5 to 6.5 Million Dollars. Costs for each collection center will vary depending on the size and requirements for spillage control and so on. Some of this expense might be recovered through a deposit/refund scheme – but that will be for the Steering Committee and the Industry to discuss and work out. Considerable investment may also be required if smelters decide to adopt “Green Slag” technology and install the necessary ancillary equipment.

What is essential for the implementation of the Regional Strategy is that reviews of any NAP are undertaken as soon as possible and modifications to the Plans introduced as quickly as is practical. Otherwise there will be a considerable delay in the implementation program.

- ix. The administrative requirements of the Basel Convention for the control of the transboundary movements of hazardous waste are well documented. One of the most important aspects of the documentation is the requirement for any hazardous waste destined for recycling is process in an Environmentally Sound Manner (ESM). However, the term ESM is not defined in precise units, or modes of operation, but in general terms. The fact that ESM is not defined as an environmental standard has lead to discrepancies in the interpretation of what constitutes ESM. In order to minimise the degree of interpretation in the recovery and recycling of ULAB the Basel Secretariat have published Technical Guidelines for the ESM of ULAB. Compliance with all the requirements set out in the Guidelines will mean that there is a very good prospect of an environmentally sound recycling process. Furthermore, the Technical Guidelines provide for the ESM of ULAB at every stage of the recycling process from collection through to smelting.

During the first phases of the ULAB Project and in conjunction with the Green Lead Work Group, an Assessment Process for the determination of the level of compliance with the Technical Guidelines was developed.

Collection Centers and Recycling plants can now be assessed for compliance with the Technical Guidelines and their level of ESM determined.

Thus it is now possible to compile a list of Collection Centers, Transport Companies and Smelters that are deemed to be Environmentally Sound and in compliance with the Technical Guidelines in a consistent manner.

Such a Data base of approved Collection Centers, Transport Companies and Smelters will ensure that ULAB are only sent to Smelters that have ESM and reduce the risk of environmental contamination and population exposure to lead during the recovery processes.

During the initial phase of the project nearly all the smelters and some of the collection centers were inspected and assessed for ESM as part of the development of the Assessment Process.

The Assessment Scheme now requires formalization through the development of Certification for ESM and compliance with the Technical Guidelines. It is important, however, that the Assessment Techniques and the use of the ESM Assessment Process are passed on to representatives from the participating countries so that the whole ESM Assessment process is sustainable and continued after the end of the Project.

It is envisaged that each country in the Project will be able to nominate 2 people to be trained as Assessors together with a representative number from the private sector. Two training courses will be run, one for English speakers and one for Spanish speakers.

- x. Once the Assessors have been trained and appointed the ESM Assessments of Recycling Plants and ULAB collection centers in the Region can commence on a formal basis with three purposes. Firstly, to determine the level of ESM and the extent of compliance with the Basel Technical Guidelines; secondly to provide guidance where there are deficiencies in compliance levels, albeit consultation with others parties and government agencies may be necessary, and finally the assessment process should be developed to the extent that it moves towards a Certification Process to confirm ESM.
- xi. All the data and information about the environmental performance of those premises and operations involved with the recycling of ULAB should be recorded on a Data Base that can be accessed by all the Government Agencies in the Region involved with the Transboundary movement of ULAB so that all parties can be assured that at any stage of the recovery process the ULAB are being either handled or process in an environmentally sound manner.

The Data base should also be accessible to all those companies in the Private Sector that are either assessed as having ESM or are certified with ESM – In this way the Industry can also check on the environmental credibility of either a supplier of ULAB or a recycler prior to a sale or purchase.

- xii. As the Government's management of the movement and recovery of ULAB improves, so there will be an increase in the administrative requirements of the Basel Convention for the transboundary movement of ULAB from one country to another. In this respect the Regional Strategy identified a training requirement for certain Customs personnel and maybe additional Government employees in the administrative requirements of the Basel Convention. Once again courses for English and Spanish Speakers will be run separately.
- xiii. Where necessary establish a formal record system for the electronic documentation of the Transboundary movement of ULAB.
- xiv. As improvements to ULAB recycling operations, including proper handling and storage of ULAB in the Region have improved during the course of the initial phases of the Project, it is clear now that nearly all the threats to either population health and the environment are coming from the Informal sector.

Whilst it is very important to police informal activities, history has shown that it is far easier to stop informal ULAB recycling if those involved in such activities are paid a fair market price for a ULAB – then they are only too pleased to pass on a whole un-drained ULAB for recycling by the formal licensed sector. Of course, this means that the “informals” need access to a formal or licensed buyer of ULAB and they also need education to explain the reason why informal ULAB recycling can be so damaging to health and the environment.

The University of the West Indies runs a very successful leaflet and information campaign to ensure that the people in Trinidad do not become involved with informal activities. Similar and widespread campaigns across the region in conjunction with information and details of where ULAB can be taken to be recycled in an ESM should be run throughout the Project.

- xv. Whilst the day to day management of the Project will be the responsibility of the Project Manager, oversight of the work, progress, scheduling and the targets should be provided on a monthly basis by a small committee – no more than four people – two representatives from the BCRC's in El Salvador and Trinidad and two people appointed by the Steering Committee.

A record of all meetings – even if they are by conference call – must be kept.

- xvi. The Project Manager will be required to prepare and present a Report at the end of each calendar year to the respective BCRC's, the SBC and the Project Steering Committee.

The report will itemise progress on each of the objectives and tasks associated with the implementation Project.

It must set out clearly the expected progress for the next 12 months and a timeline for the dates of each significant development in the Project.

There must also be a financial statement detailing all expenditures and the expected budget and expenditure to the end of the Project.

The Report must be approved by the Working Group prior to presentation to the SBC and the Steering Committee.

- xvii. The end of the Implementation Project for the Regional Strategy for the ESM of ULAB should mark the start of the Implementation of the Strategy throughout the Region and to “kick start” this next phase of the ULAB project that could involve up to 30 countries or Island States in the Region, it is proposed to hold a Regional Conference for all the participants and all other interested countries in the Region.

The conference will set out the achievements of the Project detailing the benefits of the Regional approach to recycling ULAB and explaining in detail how other nations in the region can subscribe to the Regional Strategy.

Commitments to join the Regional approach to ULAB recycling will be sought from delegates attending this conference.

At the completion of the Conference proceedings the Project Manager will submit a final report detailing the implementation of the ULAB Regional recycling strategy.

9. List of Recycling Plants and Collection Centers Assessed for ESM

Country	Organization	Designation	Assessment	ESM
Dominican Republic	Metaloxa	Recycling Plant	✓	✗
Guatemala	Acumuladores Iberia	Recycling Plant	✓	✓
Mexico	ENERTEC	Recycling Plant	✓	✓
Panama*	PAMESTA	Recycling Plant	✗*	✗*
Trinidad	ACL	Collection Center	✓	✓
Venezuela	Duncan Batteries	Recycling Plant	✓	✓
Venezuela	Funmetal	Recycling Plant	✓	✓

*PAMESTA plant was shut down at the time Assessments were undertaken and the plant only recommenced operations at the beginning of 2008.

10 Project Budget

The total cost for the implementation of the ULAB Regional Strategy is estimated to be close to US\$ 13.7 M.

However, because the private sector will have to invest so much in order to comply with national with environmental legislation, international conventions and the Basel Technical Guidelines for the recovery of ULAB, the industry contribution will be at least US\$ 10 M.

It is anticipated that most of the US\$ 10 M will have to be invested in infrastructure and capacity building activities, principally upgrading two smelters, one in Guatemala and the other in Panama. The remaining infrastructure related investments will be made in the ten countries participating in the implementation Plan by the Industry for the construction of concreted and secure areas for ULAB collection and storage. However, in certain parts of the region such collection centers will not be a viable proposition for industry and funds has been set aside from the donors' contributions for NAP, including the construction of storage compounds.

The industry will also provide the necessary technical expertise to all parties for the adoption of environmentally sound technologies and practices.

In partnership with the Green Lead Work Group, training and guidance will be provided in the development of a certification or registration process for the Environmentally Sound Management of ULAB.

The Budget envisages that more than US\$3 million will be raised from the donor community so that the necessary improvements to infrastructure, especially legislative and administrative procedures associated with the Basel Convention can be implemented. Such improvements will necessitate a comprehensive program of capacity building in order to provide competent customs officers and accredited assessors for the determination of ESM in the context of the certification/registration process.

It will also be necessary to employ more customs officers in the Region. There is increasing evidence in recent months of illicit recycling activities and smuggling of ULAB due to the huge rise in the price of lead bullion from approximately US\$ 800 a ton when the project began to about US\$ 3,000 per ton at present day prices.

In addition full implementation of the Regional Strategy will also mean an increase in legitimate and fully documented trading of ULAB from those countries without smelters to those countries with smelting capacity and therefore a corresponding increase in the workload of the customs departments.

Administration of the Project is vital and the appointment of a Coordinator is seen as a key role as is the promotion of the project and oversight by the Steering committee. Just over US\$ 500 K has been assigned for this aspect of the Project.

Table A. Estimated Total Budget for the Implementation of the Regional Strategy for the ESM of ULAB (US\$)

Item	Description	Year 1	Year 2	Year 3	Year 4
i	Submit Implementation Plan in <i>English and Spanish</i> . (Translation costs)	1,000			
ii	Selection of countries who should be involved in the implementation of the Regional Strategy.				
iv	Convene high level meeting of representatives from the participating Government Ministries of the Environment and Natural Resources and the Health Ministries to gain commitment and political direction.	50,000			
v	Appoint: Project Coordinator (4 years), Technical Expert* (4 years) and PT Trainer (1 year)	110,000	80,000	80,000	80,000
	Travel budget for: Project Coordinator (4 years), Technical Expert* (4 years) and PT Trainer (1 year)	70,000	40,000	40,000	40,000
vi	Distribute and explain the implementation process – Workshop with Industry and Government representation to optimise the regional resources and synergies – set up Steering Committee to meet once a year	31,500	30,000	30,000	30,000
vii	Participating countries from Phase 1 to complete or revise NAP where appropriate	100,000			
	Guatemala to undertake ULAB inventory, prepare NAP	15,000	5,000		
viii	Implement outstanding NAP requirements, including ULAB collection and storage facilities, and setting up transport infrastructure*, (~90% are costs to industry to build ULAB compounds in all countries and upgrade the smelters in Guatemala, Panama and Venezuela)	1,500,000	4,750,000	4,750,000	250,000
	Where necessary legislative amendments for consistent approach to ESM (based on Mexican Model)	73,000	70,000	30,000	10,000
	Additional customs staff - necessary to improve border inspection of vehicle movements associated with ULAB	50,000	50,000	50,000	50,000
	And... personnel training for Basel Convention and Technical Guideline compliance.	50,000	10,000		
ix	Train nominees from the participating countries to conduct Assessments for ESM, so that inspections can commence on a grand scale of all collection, storage, transport and recycling facilities. (2 courses – 1 x English and 1 x Spanish)	120,000			
x	Commence ESM Assessments of designated recyclers & storage compounds	40,000	30,000	30,000	10,000
xi	Set up a Regional data base of approved environmentally sound ULAB collection, storage, transport and recycling plants to ensure that at every stage of the ULAB only RSM facilities are used in the recovery process.	15,000	7,500	7,500	7,500
xii	Train Customs staff in the correct procedures for the control of transboundary movements of ULAB.	53,000	50,000		
xiii	Set up the necessary documentation procedures, where necessary, to record the transboundary movements of ULAB.	15,000	2,500	2,500	
xiv	Commence education and policing program for the informal sector throughout the region to persuade them to just collect ULAB and sell them to approved smelters.	75,000	75,000	75,000	75,000
xv	Establish a small working group administered by the two BCRC's to oversee the implementation process and maximise the use of regional resources.	10,000	10,000	10,000	10,000
xvi	Prepare and present Annual Report to the BCRC and the SBC on progress and costs (includes translation costs)	20,000	15,000	15,000	15,000
xvii	Regional Project Conference to roll the strategy out to all countries in the Region				60,000
	Annual Total	2,398,500	5,225,000	5,120,000	637,500
		Total Project Activities Costs			
		13,381,000			
		Projects overhead (13 % on UNEP administered funds)			
		277,030			
		Total Project Costs			
		13,658,030			

Table B. Estimated Infrastructure and Capacity building Budget for the Implementation of the Regional Strategy for the ESM of ULAB (US\$)

Item	Description	Year 1	Year 2	Year 3	Year 4
i	Submit implementation plans in <i>English and Spanish</i> with costs to donors. (Translation costs)				
ii	The SBC together with the Regional BCRC's should decide which countries should be involved in the implementation of the Regional Strategy. (Translation costs)				
iv	Convene high level meeting of representatives from the participating Government Ministries of the Environment and Natural Resources and the Health Ministries to gain commitment and political direction.				
v	Appoint: Project Coordinator (4 years), Technical Expert* (4 years) and PT Trainer (1 year) Travel budget for: Project Coordinator (4 years), Technical Expert* (4 years) and PT Trainer (1 year)	30,000	30,000	30,000	30,000
vi	Distribute and explain the implementation process – Workshop with Industry and Government representation to optimise the regional resources and synergies – set up Steering Committee to meet once a year	3,000	2,000	2,000	2,000
vii	Participating countries from Phase 1 to complete or revise NAP and implement where appropriate Guatemala to undertake ULAB inventory, prepare and implement NAP				
viii	Implement outstanding NAP requirements, including ULAB collection and storage facilities, and setting up transport infrastructure*, (~90% are costs to industry to build ULAB compounds in all countries and upgrade the smelters in Guatemala, Panama and Venezuela) Where necessary legislative amendments for consistent approach to ESM (based on Mexican Model) Additional customs staff - necessary to improve border inspection of vehicle movements associated with ULAB And... personnel training for Basel Convention and Technical Guideline compliance.	1,350,000	4,275,000	4,275,000	225,000
ix	Train nominees from the participating countries to conduct Assessments for ESM, so that inspections can commence on a grand scale of all collection, storage, transport and recycling facilities. (2 courses – 1 x English and 1 x Spanish)				
x	Commence ESM Assessments of designated recyclers & storage compounds				
xi	Set up a Regional data base of approved environmentally sound ULAB collection, storage, transport and recycling plants to ensure that at every stage of the ULAB only RSM facilities are used in the recovery process.				
xii	Train Customs staff in the correct procedures for the control of transboundary movements of ULAB.				
xiii	Set up the necessary documentation procedures, where necessary, to record the transboundary movements of ULAB.				
xiv	Commence education and policing program for the informal sector throughout the region to persuade them to just collect UALB and sell them to approved smelters.				
xv	Establish a small working group administered by the two BCRC's to oversee the implementation process and maximise the use of regional resources.				
xvi	Prepare and present Annual Report to the BCRC and the SBC on progress and costs (includes translation costs)				
xvii	Regional Project Conference to roll the strategy out to all countries in the Region				
	Annual Total	1,383,000	4,307,000	4,307,000	257,000
	Total Infrastructure and Capacity building Costs	10,254,000			

Table C. Estimated Policy Development, Training and Awareness Budget for the Implementation of the Regional Strategy for the ESM of ULAB (US\$)

Item	Description	Year 1	Year 2	Year 3	Year 4
i	Submit implementation plans in <i>English and Spanish</i> with costs to donors. (Translation costs)	1,000			
ii	Selection of countries who should be involved in the implementation of the Regional Strategy.				
iv	Convene high level meeting of representatives from the participating Government Ministries of the Environment and Natural Resources and the Health Ministries to gain commitment and political direction.	50,000			
v	Appoint: Project Coordinator (4 years), Technical Expert* (4 years) and PT Trainer (1 year)	80,000	50,000	50,000	50,000
	Travel budget for: Project Coordinator (4 years), Technical Expert* (4 years) and PT Trainer (1 year)	70,000	40,000	40,000	40,000
vi	Distribute and explain the implementation process – Workshop with Industry and Government representation to optimise the regional resources and synergies – set up Steering Committee to meet once a year	28,500	28,000	28,000	28,000
vii	Participating countries from Phase 1 to complete or revise NAP where appropriate	100,000			
	Guatemala to undertake ULAB inventory, prepare NAP	15,000	5,000		
viii	Implement outstanding NAP requirements, including ULAB collection and storage facilities, and setting up transport infrastructure*, (~90% are costs to industry to build ULAB compounds in all countries and upgrade the smelters in Guatemala, Panama and Venezuela)	150,000	475,000	475,000	25,000
	Where necessary legislative amendments for consistent approach to ESM (based on Mexican Model)	73,000	70,000	30,000	10,000
	Additional customs staff - necessary to improve border inspection of vehicle movements associated with ULAB	50,000	50,000	50,000	50,000
	And... personnel training for Basel Convention and Technical Guideline compliance.	50,000	10,000		
ix	Train nominees from the participating countries to conduct Assessments for ESM, so that inspections can commence on a grand scale of all collection, storage, transport and recycling facilities. (2 courses – 1 x English and 1 x Spanish)	120,000			
x	Commence ESM Assessments of designated recyclers & storage compounds	40,000	30,000	30,000	10,000
xi	Set up a Regional data base of approved environmentally sound ULAB collection, storage, transport and recycling plants to ensure that at every stage of the ULAB only RSM facilities are used in the recovery process.	15,000	7,500	7,500	7,500
xii	Train Customs staff in the correct procedures for the control of transboundary movements of ULAB.	53,000	50,000		
xiii	Set up the necessary documentation procedures, where necessary, to record the transboundary movements of ULAB.	15,000	2,500	2,500	
xiv	Commence education and policing program for the informal sector throughout the region to persuade them to just collect UALB and sell them to approved smelters.	75,000	75,000	75,000	75,000
xv	Establish a small working group administered by the two BCRC's to oversee the implementation process and maximise the use of regional resources.	10,000	10,000	10,000	10,000
xvi	Prepare and present Annual Report to the BCRC and the SBC on progress and costs (includes translation costs)	20,000	15,000	15,000	15,000
xvii	Regional Project Conference to roll the strategy out to all countries in the Region				60,000
	Annual Total	1,015,500	918,000	813,000	380,500
	Total Project Activities Costs	3,127,000			

Table D. SUMMARY of 4 year Budget for the Implementation of the Regional Strategy (US\$)

Item	Description	Year 1	Year 2	Year 3	Year 4
	Project coordination (Source of funding: international, regional financial and development institutions)				
ii	Selection of countries who should be involved in the implementation of the Regional Strategy.				
v	Appoint: Project Coordinator (4 years), Technical Expert* (4 years) and PT Trainer (1 year)	110,000	80,000	80,000	80,000
	Travel budget for: Project Coordinator (4 years), Technical Expert* (4 years) and PT Trainer (1 year)	70,000	40,000	40,000	40,000
vi	Distribute and explain the implementation process – Workshop with Industry and Government representation to optimise the regional resources and synergies – set up Steering Committee to meet once a year	31,500	30,000	30,000	30,000
xi	Set up a Regional data base of approved environmentally sound ULAB collection, storage, transport and recycling plants to ensure that at every stage of the ULAB only RSM facilities are used in the recovery process.	15,000	7,500	7,500	7,500
xiii	Set up the necessary documentation procedures, where necessary, to record the transboundary movements of ULAB.	15,000	2,500	2,500	
xv	Establish a small working group administered by the two BCRC's to oversee the implementation process and maximise the use of regional resources.	10,000	10,000	10,000	10,000
	Sub total	251,500	170,000	170,000	167,500
	Policy development, training and awareness (Source of funding: international, regional financial and development institutions)				
i	Submit implementation plans in <i>English and Spanish</i> with costs to donors. (Translation costs)	1,000			
iv	Convene high level meeting of representatives from the participating Government Ministries of the Environment and Natural Resources and the Health Ministries to gain commitment and political direction.	50,000			
	Where necessary legislative amendments for consistent approach to ESM (based on Mexican Model)	73,000	70,000	30,000	10,000
	Additional customs staff - necessary to improve border inspection of vehicle movements associated with ULAB	50,000	50,000	50,000	50,000
vii	Participating countries from Phase 1 to complete or revise NAP where appropriate	100,000			
	Guatemala to undertake ULAB inventory, prepare NAP	15,000	5,000		
viii	And... personnel training for Basel Convention and Technical Guideline compliance.	50,000	10,000		
ix	Train nominees from the participating countries to conduct Assessments for ESM, so that inspections can commence on a grand scale of all collection, storage, transport and recycling facilities. (2 courses – 1 x English and 1 x Spanish)	120,000			
x	Commence ESM Assessments of designated recyclers & storage compounds	40,000	30,000	30,000	10,000
xii	Train Customs staff in the correct procedures for the control of transboundary movements of ULAB.	53,000	50,000		
xiv	Commence education and policing program for the informal sector throughout the region to persuade them to just collect UALB and sell them to approved smelters.	75,000	75,000	75,000	75,000
xvi	Prepare and present Annual Report to the BCRC and the SBC on progress and costs (includes translation costs)	20,000	15,000	15,000	15,000
xvii	Regional Project Conference to roll the strategy out to all countries in the Region				60,000
	Sub total	647,000	305,000	200,000	220,000

Capacity building and infrastructure					
(Source of funding: industry, regional development and investment institutions)					
Implement outstanding NAP requirements, including ULAB collection and storage facilities, and setting up transport infrastructure*, (~90% are costs to industry to build ULAB compounds in all countries and upgrade the smelters in Guatemala, Panama and Venezuela)		1,500,000	4,750,000	4,750,000	250,000
Sub total		1,500,000	4,750,000	4,750,000	250,000
Annual Budget		2,398,500	5,225,000	5,120,000	637,500
Total Project Activities Budget		13,381,000			
Projects overhead (13 % on UNEP administered funds)		277,030			
Total Project Costs		13,658,030			

11. 4 Year Time Line for the Implementation Project

